EXHIBIT A DEPOSITION EXCERPTS OF BRANDON ISAACS, MD.

UNITED STATES DIST EASTERN DISTRICT OF	
DEMETRIOS VORGIAS,)
Plaintiff,	
vs.) NO.
COMMUNITY HEALTH OF CENTRAL VASHINGTON,) 1:21-CV-03013-) SAB
Defendant.)
VIDEOTAPED DEPO UPON ORAL EXAMIN DR. BRANDON I	ATION OF

TAKEN VIA REMOTE AUDIO/VISUAL TELECONFERENCE

REPORTED BY: NOREEN MATTIMOE, RPR, CCR CCR NO. 1926

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     ALSO PRESENT:
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- 1 been arrested and they were charging -- it was a CPS 2 case. 3 Q. Okay. Perfect. That helps. 4 And just so -- kind of just so you know a 5 little bit of background, this is a discovery deposition so there's a wide range of topics we may 6 7 cover just trying to get information. 8 A. Got it. 9 Q. Okay. What's your current position related to your 10 job?
- 11 A. I am the current Program Director/DIO for Central
 12 Washington Family Medicine Residency in Yakima.
 - Q. Okay. And tell me, in terms of what's the relationship for Central Washington Family Medicine as it relates to Community Health of Central Washington.
 - A. Community Health of Central Washington is the sponsoring institution for Central Washington Family Medicine Residency, so all personnel management, financial responsibility, all gets funneled through that as the primary entity that sponsors our residency.
 - Q. All right. That's helpful. So to confirm: The personnel management includes management of the residents?
- 24 A. Correct.

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25 Q. All right. The --

1 A. Yes, and it is purposefully void -- or vague, I should 2 say, in an attempt to maintain patient confidentiality 3 appropriately. 4 So their determination is, exactly as you said 5 right there, is to determine if you are fit to practice 6 as a resident. That is the main thing we need to know; 7 that there is nothing that is problematic in their 8 ability to be a practitioner. Q. Part of the purpose, though, as I understand it, is 9 10 you're trying to figure out if there's something you, 11 as the program director and/or program, can do to 12 assist a struggling resident in the program; true? 13 A. Depending on the recommendation from WAPHP, yes. 14 Q. And if you receive a good -- a good -- strike that. 15 If you receive a recommendation from Washington 16 Physician's Health Program, do you typically follow the 17 recommendation or do you just ignore it? 18 A. We follow it --19 MR. BAILEY: Objection. Hypothetical. 20 Q. Go ahead, doctor. A. Yeah. We follow it, otherwise we wouldn't ask for it 21 22 in the first place. 23

Q. Okay. And then I want to move down a little bit on No. 10. It's highlighted here where it says, (as

24

25

read:) "You will seek, with the stress of residency --

1 CERTIFICATE 2 STATE OF WASHINGTON) SS. 3 COUNTY OF CHELAN 4 5 THIS IS TO CERTIFY that I, Noreen Mattimoe-Nystrom, 6 residing in Cashmere, Washington, reported the within and 7 foregoing testimony; said testimony being taken before me as 8 a licensed Washington State Court Reporter on the date 9 herein set forth; that said examination was taken by me in shorthand and thereafter under my supervision transcribed, 10 11 and that same is a full, true and correct record of the 12 testimony, including all questions, answers and objections, 13 if any, by counsel, to the best of my ability. 14 I further certify that I am not a relative, 15 employee, attorney, counsel of any of the parties; nor am I 16 financially interested in the outcome of the cause. 17 Transcribed notes will be destroyed three years 18 from the affixed date unless requested by counsel to retain 19 them. 20 WITNESS MY HAND this 2nd day of November, 2021. 21 22 23 24 Noreen Mattimoe-Nystrom, RPR, CCR 25 CCR NO, 1926

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